

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS, INC., *et al.*,
Debtors.

Chapter 11 Case

No. 08-13555 (JMP)

(Jointly Administered)

STIPULATION AND ORDER REGARDING DISCOVERY

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtor, Lehman Commercial Paper Inc. (“LCPI”), as debtors and debtors in possession (together, the “Debtors” and, collectively with their debtor and non-debtor affiliates, “Lehman”) and Yarpa Investimenti S.G.R. S.p.A – RP3 Fund (“Yarpa”) hereby submit the following Stipulation and Order Regarding Discovery for the Bankruptcy Court’s consideration. The parties respectfully request that the Court enter the following discovery schedule:

DISCOVERY SCHEDULE

July 21, 2009:	Last day to serve First Set of Document Requests
October 30, 2009:	Deadline to complete production of responsive documents that are available to a party prior to September 30, 2009
November 13, 2009:	Last day to serve First Set of Interrogatories
December 18, 2009:	Deadline for completion of Document Production
January 8, 2010:	Last day to serve written Discovery Requests
February 28, 2010:	Deadline for completion of Depositions

Responses to written discovery requests shall be served according to the applicable rules, unless the parties otherwise agree or upon Order of this Court for good cause shown.

Dispositive motions, if any, shall be filed on or before April 2, 2010, with responses due twenty one (21) business days thereafter, and replies due ten (10) business days thereafter. If no dispositive motion is filed, an evidentiary hearing date will be set by the Court.

Dated: New York, New York
August 10, 2009

REED SMITH LLP

/s/ John L. Scott
John L. Scott

599 Lexington Avenue
New York, New York 10022
Telephone: (212) 521-5400

*Attorneys for Yarpa Investimenti S.G.R.
S.p.A – RP3 Fund*

Dated: New York, New York
August 10, 2009

WEIL, GOTSHAL & MANGES LLP

/s/ Richard L. Levine
Richard L. Levine

767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000

*Attorneys for Debtors and Debtors in
Possession*

SO ORDERED:

Dated: New York, New York
August 12, 2009

s/ James M. Peck
Honorable James M. Peck
United States Bankruptcy Judge